

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA ) Criminal No. 1:21-CR-00158  
                                )  
v.                            )     Count 1: 18 U.S.C. § 2251(a) & (e)  
ASHLEY NICOLE KOLHOFF,   )     Count 2: 18 U.S.C. § 2252(a)(2) & (b)(1)  
                            *Defendant.* )     Production of Child Pornography  
                            )     Distribution Child Pornography  
                            )  
                            )     Forfeiture Notice  
                            )

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INDICTMENT

July 2021 Term—at Alexandria, Virginia

COUNT ONE  
(Production of Child Pornography)

THE GRAND JURY CHARGES THAT:

Between in or about September 2020 and in or about October 2020, within the Eastern District of Virginia and elsewhere, the defendant, ASHLEY NICOLE KOLHOFF, did employ, use, and coerce a minor, MINOR VICTIM 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was actually transported or transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce or mailed, and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer.

(In violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT TWO**  
**(Distribution of Child Pornography)**

THE GRAND JURY FURTHER CHARGES THAT:

Between in or about September 2020 and in or about October 2020, within the Eastern District of Virginia and elsewhere, the defendant, ASHLEY NICHOLE KOLHOFF, did knowingly distribute a visual depiction using any means and facility of interstate or foreign commerce, and had been shipped or transported in or affecting interstate or foreign commerce, or which contained materials which had been mailed or so shipped or transported, by any means, including by computer, and the producing of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

(In violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).)

**FORFEITURE NOTICE**

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

The defendant, ASHLEY NICHOLE KOLHOFF, is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of any Count set forth in the Indictment, she shall forfeit to the United States, pursuant to 18 U.S.C. §§ 2253(a): (1) any visual depiction described in 18 U.S.C. § 2251 *et seq.* or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction; (2) any property real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Pursuant to 21 U.S.C. § 853(p), the defendant shall forfeit substitute property, if, by any act or omission of the defendant's, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with Title 18, United States Code, Section 2253(a); and Federal Rule of Criminal Procedure 32.2.)

A TRUE BILL  
**Pursuant to the E-Government Act,  
The original of this page has been filed  
under seal in the Clerk's Office**

Raj Parekh  
Acting United States Attorney

By: Whitney Kramer  
Whitney Kramer  
Special Assistant United States Attorney (LT)  
Seth Schlessinger  
Assistant United States Attorney